

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. G-9, SUB 698**

In the Matter of:)	
Application of Piedmont Natural)	PETITION OF NCSEA TO
Gas Company, Inc. for Approval Of)	INTERVENE
Appendix F to its North Carolina)	
Service Regulations	

PETITION OF NCSEA TO INTERVENE

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, the North Carolina Sustainable Energy Association (“NCSEA”) hereby petitions to intervene in the above-referenced docket. In support of this petition, NCSEA states as follows:

1. NCSEA is a non-profit corporation formed under the laws of North Carolina, with individual, business, and government members located across the State. NCSEA’s mission is to promote a sustainable future through the use of renewable energy and energy efficiency programs. NCSEA seeks to achieve its objectives by advocating for public policies that encourage the responsible technological and market development of renewable energy and energy efficiency, including all aspects of demand side management, a smart grid, energy storage, and vehicle electrification.
2. The Commission’s ruling in this docket may have broad implications for both NCSEA and its members. NCSEA was a chief proponent of North Carolina’s Renewable Energy and Energy Efficiency Portfolio Standard (“REPS”) and has a direct and substantial interest in its implementation to assure that the policies and goals of the REPS law are achieved in a manner consistent with the legislative intent.
3. In its *Order on Request for Declaratory Ruling*, Docket No. SP-100, Sub 29 (March 21, 2012), the Commission determined that, subject to certain conditions, “the Directed

Biogas would be a renewable energy resource and the resulting electric generation would be eligible to earn RECs that may be used for REPS compliance.”

4. In this docket, the Piedmont Natural Gas Company, Inc. (“PNG”) has proposed an amendment to its North Carolina Service Regulations which, if adopted, will set standards applicable to “Alternative Gas,” including directed biogas, transported in PNG’s system. PNG’s proposed amendment will have a direct impact on the transportation of directed biogas and will potentially affect the ability of electricity suppliers to meet their obligations under the REPS.

5. NCSEA’s participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

6. NCSEA’s address is 4800 Six Forks Road, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

Peter H. Ledford
Counsel for NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org

7. Pursuant to Commission Rule R1-39, NCSEA agrees to electronic service of all pleadings and other filings in this matter.

WHEREFORE, for the reasons set forth above, NCSEA prays that it be allowed to intervene in this matter.

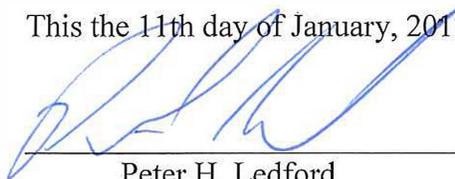
Respectfully submitted,

/s/ Peter H. Ledford
Peter H. Ledford
Counsel for NCSEA
N.C. State Bar No. 42999
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org

VERIFICATION

Peter H. Ledford, first being duly sworn, deposes and says that he is the attorney for NCSEA; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of NCSEA.

This the 11th day of January, 2017.



Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

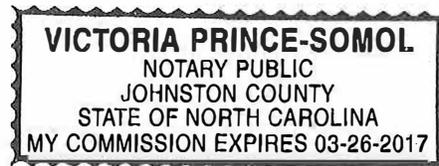
Sworn to and subscribed before me,

this the 11th day of January, 2017.

[AFFIX SEAL OF NOTARY]



Notary Public



Victoria Prince Somol
Printed Name of Notary Public
My Commission Expires: 3-26-2017

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Petition to Intervene by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 11th day of January, 2017.

 /s/ Peter H. Ledford
Peter H. Ledford
Counsel for NCSEA
N.C. State Bar No. 42999
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org